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Jeremy M. Brooks, Esq. (Bar ID #245932018)
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(908) 795-5200
ATTORNEYS FOR DEFENDANTS
Shimmick Construction Co., Inc.; Habib Rahim, and
Carrie Masiello

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

STEVEN MITCHELL,	:	Civil Action No.
	:	
Plaintiff,	:	
	:	NOTICE OF COMPLIANCE WITH
v.	:	28 U.S.C. § 1446(d)
	:	
SHIMMICK CORPORATION; HUDSON	:	
BERGEN LIGHT RAIL; NEW JERSEY	:	
TRANSIT; HABEEB RAHIM; CARRIE	:	
MASIELLO and DOES 1-10,	:	
Defendants.	:	

To:	Melissa E. Rhoads, Esq., Clerk of Court	Mark T. Sadaka
	U.S. District Court for the District of	Sadaka Law, LLC
	New Jersey	155 North Dean Street, 4 th Floor
	Martin Luther King Building & U.S.	Englewood, New Jersey 07631
	Courthouse	Attorneys for Plaintiff
	50 Walnut Street	
	Newark, NJ 07102	

Pursuant to the requirements of 28 U.S.C. § 1446(d), on June 4, 2024, a notice of filing of petition for removal, a true copy of which is attached hereto as Exhibit A, will be filed with the Clerk of the Superior Court of the State of New Jersey for the County of Middlesex.

Respectfully submitted,

JACKSON LEWIS P.C.

By: s/ John C. Petrella
John C. Petrella
Jeremy M. Brooks

Dated: June 5, 2024
4895-1497-7474, v. 1

EXHIBIT A

John C. Petrella, Esq. (Bar ID #003961989)
Jeremy M. Brooks, Esq. (Bar ID #245932018)
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Berkeley Heights, New Jersey 07922
(908) 795-5200
ATTORNEYS FOR DEFENDANTS
Shimmick Construction Co., Inc.; Habeeb Rahim, and
Carrie Masiello

STEVEN MITCHELL,	:	SUPERIOR COURT OF NEW JERSEY
	:	MIDDLESEX COUNTY: LAW DIVISION
Plaintiff,	:	DOCKET NO.: HUD-L-001722-24
	:	
v.	:	Civil Action
	:	
SHIMMICK CORPORATION; HUDSON	:	NOTICE OF FILING AND PETITION
BERGEN LIGHT RAIL; NEW JERSEY	:	FOR REMOVAL
TRANSIT; HABEEB RAHIM; CARRIE	:	
MASIELLO and DOES 1-10,	:	
	:	
Defendants.		

To: Clerk, Superior Court of New Jersey
Middlesex County Courthouse
56 Paterson Street
New Brunswick, NJ 08903

Mark T. Sadaka
Sadaka Law, LLC
155 North Dean Street, 4th Floor
Englewood, New Jersey 07631
Attorneys for Plaintiff

PLEASE TAKE NOTICE that Defendants¹, Shimmick Construction Company, Inc. (improperly pled as “Shimmick Corporation”); Habeeb Rahim; and Carrie Masiello (collectively, the “Shimmick Defendants”), have forwarded for filing a notice and petition for removal of this action to the United States District Court for the District of New Jersey on June 5, 2024. A copy of the notice and petition filed with the United States District Court is submitted

¹ Hudson Bergen Light Rail is not a legal entity, rather it is a light rail transit system. Therefore, it is not a proper party to this matter and the Complaint should be amended to reflect as much.

herewith as Exhibit 1.

PLEASE TAKE FURTHER NOTICE, that the Shimmick Defendants hereby file a copy of its notice and petition with the Superior Court of New Jersey, Law Division, Hudson County in accordance with 28 U.S.C. § 1446(c).

Respectfully submitted,

JACKSON LEWIS P.C.

By: s/ John C. Petrella
John C. Petrella
Jeremy M. Brooks
ATTORNEYS FOR DEFENDANTS

Dated: June 5, 2024